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SIERRA MENTAL WELLNESS GROUP,
JOSH SIMPSON, and SHELLI WATSON

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

LINDA COOPER, Individually, and on
the behalf of the Estate of Decedent,
ELINA QUINN BRANCO,

Plaintiffs,

vs.

COUNTY OF SAN LUIS OBISPO, a
government entity, form unknown;
SIERRA MENTAL WELLNESS
GROUP, a California non-profit
corporation; JASON HOOSON,
individually; SAVANNAH
WILLIAMS, individually; JOSH
SIMPSON, individually; BONNIE
SAYERS, individually; JULIA TIDIK,
individually; BETHANY AURIOLES,
individually; JANET BROWN,
individually; SHELLI WATSON,
individually; and DOES 1 through 10,
inclusive,

Defendants.

CASE NO: 2:24-cv-08187-SVX (AJRx)
District Judge: Stephen V. Wilson,
Court Room 10A
Magistrate Judge: A. Joel Richlin

DECLARATION OF SONJA M. DAHL,
ESQ. IN SUPPORT OF REQUEST FOR
REMOTE APPEARANCE AT
HEARING ON MOTION OF
DEFENDANTS SIERRA MENTAL
WELLNESS GROUP, JOSH SIMPSON,
AND SHELLI WATSON TO DISMISS
PUNITIVE DAMAGES ALLEGATIONS

DATE: December 16, 2024
TIME: 1:30 p.m.
DEPT: 10

Complaint Filed: September 25, 2024
Trial Date: None Set

I, Sonja M. Dahl, declare:

1. I am an attorney at law duly licensed to practice before all the courts of
the State of California and am admitted to this court. I am an associate employed by




1 the law firm of Veatch Carlson, LLP, counsel of record for Defendants Sierra Mental
2 Wellness Group, Josh Simpson and Shelli Watson. I plan to appear for the hearing on
3 the motion of said Defendants to dismiss the punitive damages allegations from
4 Plaintiff's Complaint on file herein, as I prepared the moving papers and the reply
5 brief setting forth the arguments in favor of the Defendants. The motion is set for
6 hearing at the above-stated date, time and location.

7 2. I am informed and believe that the court has issued an order setting a
8 Status Conference to take place at the same time at the hearing on our motion, and has
9 issued an order allowing all counsel to appear remotely for the Status Conference.
10 Mark Rudy, Esq., of our firm is trial counsel, and will appear remotely for the Status
11 Conference in this matter which I understand will take place immediately after the
12 hearing on Defendants' motion to dismiss punitive damages.

13 3. Since the court has allowed all counsel to appear for the Status
14 Conference remotely, we have assumed that this order also applied to the hearing on
15 our motion to dismiss the punitive damages allegations, and that the court is also
16 allowing a remote appearance for the motion to dismiss. Out of an abundance of
17 caution, however, I am filing this declaration to formally request permission to appear
18 via the court's zoom link for the hearing on our motion to dismiss. If the court did not
19 intend that the motion to dismiss would be included in the court's permission to
20 appear remotely, I will be happy to appear in person. It may be easier for the court if
21 everyone appears via the same modality.

22 I declare under penalty of perjury under the laws of the United States that the
23 foregoing is true and correct.

24 Dated: December 9, 2024



Sonja M. Dahl

26 *Pursuant to Local Rule 5-4.3.4(2), the filer attests that all signatories listed, and on
27 whose behalf the filing is submitted, concur in the filing's content and have authorized
28 the filing.



CERTIFICATE OF SERVICE

Linda Cooper v. County of San Luis Obispo, et al.
Case No.: 2:24-cv-08187-DDP (AJRx)

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 1055 Wilshire Boulevard, 11th Floor, Los Angeles, California 90017-2444.

On December 9, 2024, I served the foregoing document described as:
DECLARATION OF SONJA M. DAHL, ESQ. IN SUPPORT OF REQUEST FOR
REMOTE APPEARANCE AT HEARING ON MOTION OF DEFENDANTS
SIERRA MENTAL WELLNESS GROUP, JOSH SIMPSON, AND SHELLI
WATSON TO DISMISS PUNITIVE DAMAGES ALLEGATIONS on interested
parties in this action by one or more of the following methods:


(SEE ATTACHED SERVICE LIST)

- ☒ **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed document(s) with the Clerk of the Court by using the CM/ECF system. Participants in this case who are registered CM/ECF users will be served by the CM/ECF system. Participants in this case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.
- ☐ **BY MAIL (C.C.P. §§ 1013a, et seq.):** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation or postage meter date is more than one day after date of deposit for mailing in affidavit.
- ☐ **BY PERSONAL SERVICE:** I delivered such envelope(s) by hand to the offices of the addressee(s).
- ☒ **FEDERAL:** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

I declare under penalty of perjury under the laws of the United States of America and State of California, that the foregoing is true and correct.

Dated: **December 9, 2024**

Sonja Dahl
Type or Print Name


Signature



SERVICE LIST

Linda Cooper v. County of San Luis Obispo, et al.
Case No.: 2:24-cv-08187-DDP (AJRx)

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